

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

In Re:

JAMES P STANELL

Debtor

Chapter 13

Bankruptcy No.24-10913-AMC

OBJECTION OF CHAPTER 13 TRUSTEE  
TO CONFIRMATION OF PLAN OF DEBTOR

**AND NOW** comes Kenneth E. West, Esq., Standing Chapter 13 Trustee, to object to confirmation of the chapter 13 plan of the Debtor, because it fails to comply with 11 U.S.C. Sections 1322 and/or 1325 of the Bankruptcy Code, and/or Debtor has failed to provide information, evidence, or corrections to the petition, schedules, statements, or other documents filed by Debtor to enable the standing trustee to evaluate the Plan for confirmation, as follows:

The Plan fails to provide that all of the projected disposable income of debtor(s), who has/have current monthly income which is above median, will be applied to make payments to unsecured creditors under the Plan, in violation of 11 U.S.C. Section 1325 (b)(3).

The Plan calls for escalating payments without indication of ability of debtor(s) to make such payments.

Schedules I and J indicate that the debtor(s) will not be able to make all payments under the Plan and to comply with the Plan, in violation of 11 U.S.C. Section 1325 (a)(6).

**WHEREFORE**, the standing trustee requests that the Court enter an order in the form annexed hereto denying confirmation of the Plan.

Respectfully submitted,

/s/ Kenneth E. West

Kenneth E. West, Esquire  
Chapter 13 Standing Trustee